

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

----- X

This document relates to: *Horace Morris et al. v. Islamic Republic of Iran*,

No. 1:18-cv-05321 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 21, as permitted and approved by the Court's Order of October 28, 2019, ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	New Plaintiff's Name (alphabetical by last name)	New Plaintiff's State of Residency at Filing (or death)	New Plaintiff's Citizenship/ Nationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Eddie Ottenwalder	FL	United States	Isidro Ottenwalder	Sibling	Line 26
2	Nilda Ottenwalder	FL	United States	Isidro Ottenwalder	Sibling	Line 26
3	Olga Ottenwalder	NJ	United States	Isidro Ottenwalder	Sibling	Line 26
4	Linda Amato	NY	United States	Timothy A. Roy	Sibling	Line 72
5	James Roy	NJ	United States	Timothy A. Roy	Sibling	Line 72
6	John Roy	NY	United States	Timothy A. Roy	Sibling	Line 72
7	John Roy as Personal Representative of the Estate of Ida Mae Roy	NY	United States	Timothy A. Roy	Parent (deceased)	Line 72
8	Gary Roy	NY	United States	Timothy A. Roy	Sibling	Line 72
9	Kenneth Roy	FL	United States	Timothy A. Roy	Sibling	Line 72
10	Douglas Roy	FL	United States	Timothy A. Roy	Sibling	Line 72
11	Sami Nassar	MA	United States	Jude Moussa	Co-PR	Line 3
12	Steven Romagnolo	NY	United States	Joseph M. Romagnolo	Sibling	Line 70
13	Shaun L. Rodgers	NJ	United States	Venesha Richards	Sibling	Line 59

Dated: January 10, 2020

Respectfully submitted,
/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the *Horace Morris et al. v. Islamic Republic of Iran* Plaintiffs' Notice of Amendment was filed electronically this 10th day of January, 2020. Notice of this filing will be served upon all parties in 03 MDL 1570 and 1:18-cv-05321 (GBD)(SN) by operation of the Southern District of New York's Electronic Case Filing ("ECF") system, which all parties may access.

New York, NY
January 10, 2020

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.